

In the Matter of Review of the Emergency Alert System

EB Docket No. 04-296

Notice of Proposed Rulemaking

Adopted: August 8, 2004

Released: August 12, 2004

Comments Concerning the FCC Review of the Emergency Alert System

I very much appreciate the opportunity to comment on the need for an effective National emergency warning capability and the Emergency Alert System (EAS). Although I was a hearing person for most of my life, I am now one of 25 to 28 million people in the United States who is deaf or hard of hearing. I am on the Board of Deaf and Hard of Hearing in Government (DHHIG) and am a member of both Self Help for Hard of Hearing People (SHHH) and the Association of Late Deafened Adults. As part of my activities with DHHIG, I have participated in meetings with numerous Government agencies on disability issues, including captioning issues in the television and motion picture industries. I planned and hosted a National Conference on for people with disabilities. As part of my job at the National Weather Service, I have participated in emergency warning outreach to the deaf and hard of hearing. I recently served as the Technical Panel Chair of the GSA Source Selection Evaluation Board in the award of the Federal Relay Service contract.

I have never received, as either a hearing person or a deaf person, an emergency warning issued by the Emergency Alert System. In many documented cases, where local television stations reissued emergency warnings received from the National Weather Service as onscreen "crawls," they are hidden behind the on-screen captioning. In many cases where the emergency event is treated as a news event by the local station, live captioning is either not available or is of such poor quality as to make it difficult to understand. News broadcasts on 9/11 and the following few days were terrible for deaf and hard of hearing people. When stations shifted to their news studios, with full staffs, and dialed up their captioning services, captioning was generally available. However, when they broke in to give updates - either broke into regular programming or even broke in to their own broadcasts - there was no captioning. I had to keep switching from channel to channel to find one that would tell me what was going on.

A few days afterwards, some of the stations covered days of mourning events, including a service with Billy Graham from the National Cathedral in Washington, DC. It was captioned when live, but when it was replayed in its entirety later in the evening, it was without captioning.

It was an extremely stressful time for all Americans, but more so for those who couldn't hear what was taking place.

On the other hand, I have and continue to get emergency warnings broadcast by the National Weather Service on NOAA Weather Radio. In my home and at work, I have an NWR radio equipped with accessories that can notify me or wake me, even when I'm not wearing my cochlear implant and hearing aid. With the receiver programmed to alarm only for my immediate area, the NWR receiver displays the event type (Tornado, Flash Flood, its immediacy (Warning - happening now or Watch - expected to happen), and how long the event is expected to last. I plan to have an NWR receiver connected directly to my central home security/fire alarm system. I recently bought an RCA AlertGuard television with a built-in NWR receiver that flashes lights, sounds a siren, and has a pop-up screen with emergency information when activated by an NWR broadcast. In June of this year, AlertGuard was vividly demonstrated at a National SHHH convention in Omaha, when its lights, siren, and pop-up screen were repeatedly activated as the National Weather Service issued successive Severe Thunderstorm, Tornado, and Flash Flood Warnings.

I have been completely frustrated in attempts to have local broadcasters, National Networks, the FCC, cable companies, and captioning companies fix the captioning problems on television. I even searched and found a company, ENCO, Inc., at the 2003 National Association of Broadcasters Radio Show in Philadelphia, whose President developed a completely automated captioning system superior to any live captioning system. I coordinated several demonstrations to no avail. Broadcasters, the FCC, and captioning companies showed not interest. EAS suffers from the same disinterest. Instead of pursuing costly and significant changes to EAS, which will do little to solve the fundamental problem of quickly collecting and distributing emergency warnings to those at risk, the Government should be more closely examining other options.

NOAA NWS has an effective, demonstrated, and documented record of saving lives. It has been doing this for many years. NWR, one component of this emergency warning capability, has doubled its size over the past ten years through Congressional support and partnerships funded by the USDA, many States, and numerous public/private organizations. It seems only logical to build on these publicly funded NWS assets rather than trying to find new technologies and spending scarce resources and funds in designing and deploying new networks that cannot markedly improve on the timeliness and reliability of the existing NOAA NWS infrastructure.